

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
GMA ACCESSORIES, INC., :
:
Plaintiff, :
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v. :
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CHARLOTTE SOLNICKI, CHARLOTTE B, LLC, :
EMINENT, INC., SAKS FIFTH AVENUE, INC., :
INTERMIX, INC., WINK NYC, INC., : 07 CV 3219 (LTS)(DCF)
LISA KLINE, INC., GIRLSHOP, INC., :
SHOWROOM SEVEN STUDIOS, INC., :
ELECTRIC WONDERLAND, INC., :
SHOWROOM SEVEN INT'L, :
SHOWROOM SEVEN, JONATHAN SINGER, :
GOSI ENTERPRISES, LTD., LEWIS TIERNEY, :
TIERNEY DIRECT LLC and :
JONATHAN SOLNICKI, :
:
Defendants. :
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DECLARATION OF CHARLOTTE RONSON IN SUPPORT OF SANEI
CHARLOTTE RONSON, LLC'S MOTION TO SEVER AND STAY
PLAINTIFF'S MOTION FOR CONTEMPT AND IN SUPPORT OF SANEI
CHARLOTTE RONSON, LLC'S OPPOSITION TO GMA ACCESSORIES,
INC.'S MOTION FOR CONTEMPT

CHARLOTTE RONSON declares as follows under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Charlotte Ronson, and I am a fashion designer. My name, CHARLOTTE RONSON, is used as a trademark for my clothing line. That clothing line was previously sold by C. Ronson, Inc., but is now being sold by Sanei Charlotte Ronson, LLC ("Ronson").

2. In September 1999, I began selling my original clothing designs using the mark C. RONSON. In May 2002, I opened a clothing boutique in downtown New York

City known as C. RONSON. In early 2005, operating as C. Ronson Inc., I began to use my full name, CHARLOTTE RONSON, as a trademark. In 2006, C. Ronson Inc. assigned its rights to the CHARLOTTE RONSON trademark to Ronson. Ronson clothing and related accessories are also sold in numerous retail locations across the United States and around the world and through many retail websites.

3. Ronson does not use the first name, CHARLOTTE, separately from the last name, RONSON, as a trademark. Ronson instead uses either uses C. RONSON or the full name CHARLOTTE RONSON. The word CHARLOTTE is always used in the same color as the name RONSON, and the mark is always presented as a unitary whole.

4. To my knowledge, neither I nor anyone at Ronson was ever served with a copy of the BOP, LLC injunction. When BOP placed orders for CHARLOTTE RONSON merchandise for Spring/Summer 2008, Ronson filled those orders.

5. I have reviewed the invoices for CHARLOTTE RONSON merchandise that was sold to BOP between November 2007 and February 2008 for the Spring/Summer 2008 seasons. Those orders totaled \$31,715.00 in November 2007 and \$64,425.79 in January and February 2008. My counsel has informed me that copies of those invoices were produced to GMA.

6. I am aware that it is very common in the fashion industry for designers to have the same first or last names as other designers as trademarks. For instance, Christian Dior, Christian Lacroix and Christian Louboutin are all designers that coexist in the marketplace, as are Tommy Hilfiger and Tommy Bahama. In addition, Calvin Klein and Anne Klein coexist in the marketplace as do Cynthia Steffe, Cynthia Rowley and Cynthia Vincent, among others. Moreover, designers such as Brian Reyes coexist in the

fashion marketplace with Reyes. Numerous other fashion designers have the same first or last names.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 10, 2008
New York, New York

/s/ Charlotte Ronson
Charlotte Ronson